

Date/Time Stamp

COVER SHEET FOR AMENDMENT OF POST-TRAVEL SUBMISSION

Instructions: Use this form as a cover sheet for any paperwork you may need to submit to the **Office of Public Records** in order to make your Privately Sponsored Post-Travel Submission complete in accordance with Rule 35. **Only complete this form if you need to submit an amendment to a post-travel filing you have already submitted.**

SUBMIT DIRECTLY TO THE OFFICE OF PUBLIC RECORDS IN 232 HART BUILDING

Name of Traveler: Chelsie Keys

Employing Office/Committee: Senate Committee on Agriculture, Nutrition and Forestry

Travel Expenses Paid by (List all sources): National Corn Growers Association

Travel Date(s): November 22, 2019

Description/Title of Attached Forms: Form RE-1, Form RE-2

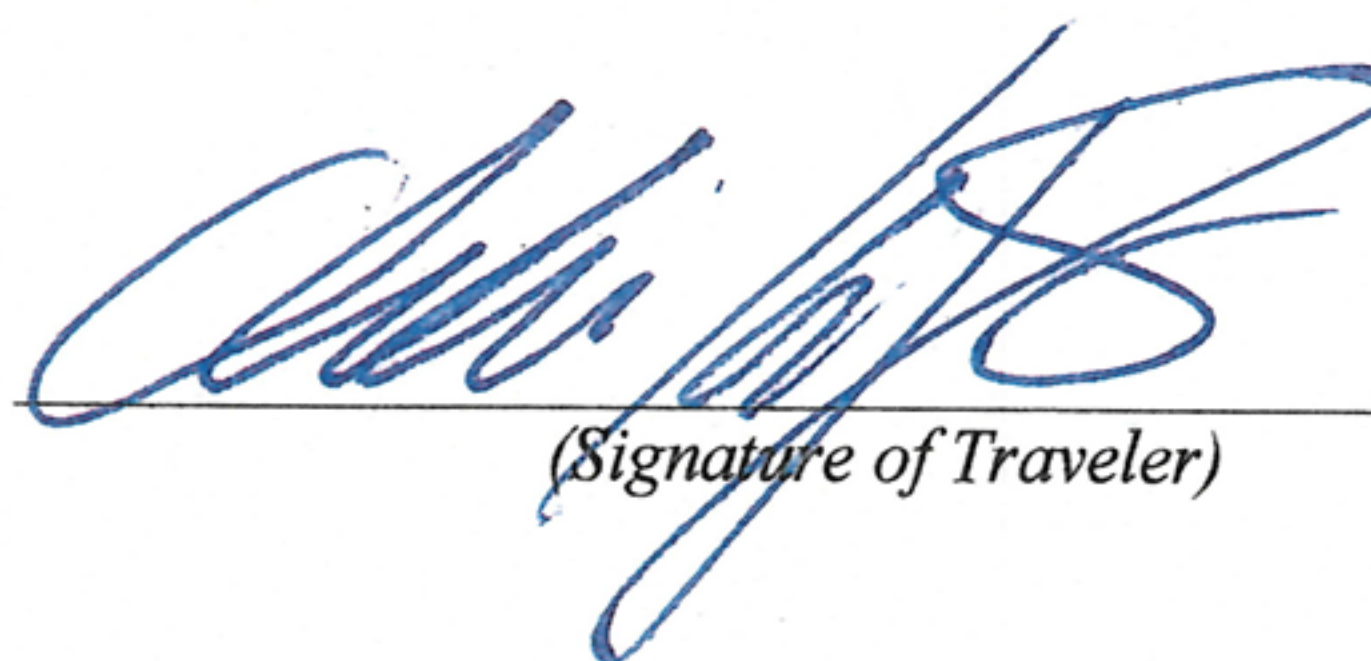
Official Invitation, Official Itinerary, and Private Sponsor Travel Certification Form

Purpose of Amendment (describe the reason for amending original submission):

Inadvertently omitted documents from original submission on 01.06.20.

06.09.2020

(Date)



(Signature of Traveler)

Date Time Stamp:

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics** in SH-220. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Chelsie KeysEmploying Office/Committee: Senate Committee on Agriculture, Nutrition and ForestryPrivate Sponsor(s) (list all): National Corn Growers Association/Soil Health PartnershipTravel date(s): November 22, 2019*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*Destination(s): Rock Hall, Maryland

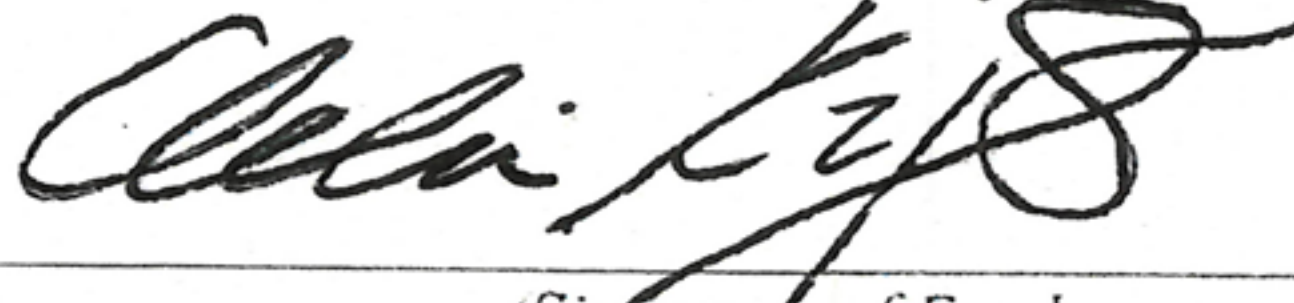
Explain how this trip is specifically connected to the traveler's official or representational duties:

I work on conservation and environment issues for the Committee, among other things. This tour will provide staff a first hand look at technologies farmers are voluntarily implementing to improve soil health.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

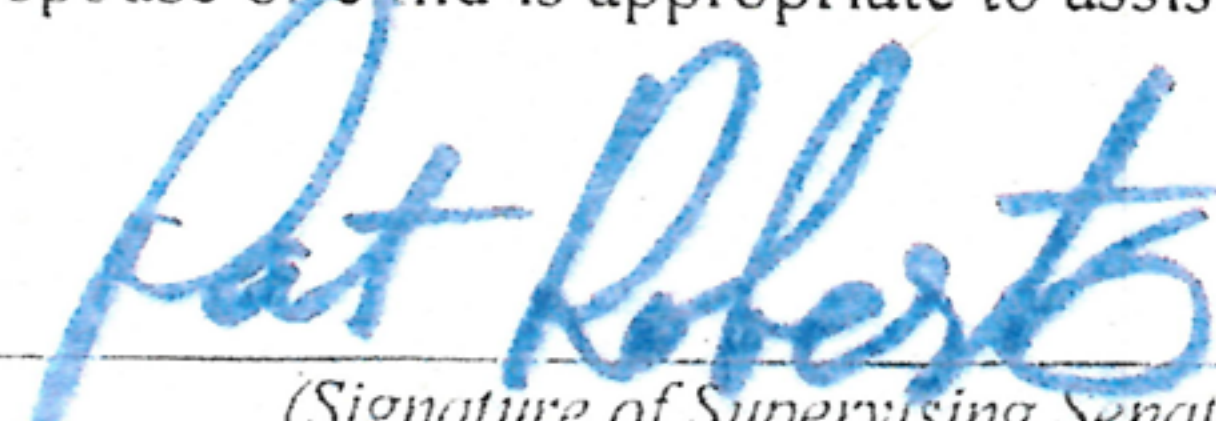
(Date)
(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Senator Pat Roberts hereby authorize Chelsie Keys
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

06-09-2020
(Date)
(Signature of Supervising Senator/Officer)

Employee Post-Travel Disclosure of Travel Expenses

Date/Time Stamp:

Post-Travel Filing Instructions: Complete this form within 30 days of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building.**

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☒ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
☒ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

Private Sponsor(s) (list all): National Corn Growers Association Soil Health Partnership

Travel date(s): November 22, 2019

Name of accompanying family member (if any): _____

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING DID NOT INCREASE DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input checked="" type="checkbox"/> Good Faith Estimate	\$12.30 (estimate: driving 80 miles, gas		\$19.47 (actual)	
<input checked="" type="checkbox"/> Actual Amount	\$2.30/gallon, approx 15 miles/gallon).			

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate				
<input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.):

Farm tour, power point presentation, discussions with farmer owner/operator.

06-09-20 Chelsie Keys
 (Date) (Printed name of traveler)

[Signature]
 (Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connection with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

06-09-20
 (Date)

[Signature]
 (Signature of Supervising Senator/Officer)

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors): National Corn Growers Association
2. Description of the trip: The Field Day event will focus on how Harborview Farms has worked to create an advanced soil health management system. Key themes: soil health, conservation, and farm economics
3. Dates of travel: November 22, 2019
4. Place of travel: Harborview Farms, Rockville Maryland
5. Name and title of Senate invitees: Please see attached list.
6. I *certify* that the trip fits one of the following categories:

☐ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

~~OR~~

☒ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.

~~AND~~

☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:

☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.

~~AND~~

☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☒ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

~~OR~~

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

~~OR~~

☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

Not Applicable

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

The Soil Health Partnership (SHP) is a program of the National Corn Growers Association (NCGA).

SHP staff will be conducting the site visit, educating attendees about soil health management. Other

NCGA Employees will be providing logistics support (such as transportation and catering).

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

NCGA's mission is to create and increase opportunities for corn growers. This trip will inform Senate staff

about one of NCGA's programs to create better economic outcomes through conservation and

soil health.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

NCGA has not sponsored a congressional trip in more than 5 years. Events such as these are done on an

ad hoc basis, when there is an opportunity to share and educate staff or members on specific activities

of NCGA, or the needs of our members that are better understood in person.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

NCGA educates through grassroots efforts such as sharing our members' stories on Capitol Hill or in media. We also educate our members through leadership programs and working with our members on programs such as SHP for ongoing research and better data for all of agriculture.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate <input type="checkbox"/> Actual Amounts	\$80	None	\$20	None

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

The event is being arranged specifically with regard to congressional participation. The event is to show staff the technical side of soil health and to showcase the research and data the program has gathered.

18. Reason for selecting the location of the event or trip

This farm is the one nearest to DC participating in the program.

19. Name and location of hotel or other lodging facility:

None

20. Reason(s) for selecting hotel or other lodging facility:

Not applicable

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Cost for the meal is significantly lower than the official rate of \$55/day for official Federal Government travel. There are no lodging costs associated with this event.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:


A coach class motorcoach will be hired to provide transportation for the day.

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

No entertainment will be provided.

25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):

Signature of Travel Sponsor: 

Name and Title: Brooke Appleton, Vice President, Public Policy

Name of Organization: National Corn Growers Association

Address: 20 F Street NW, Washington DC 20001

Telephone Number: 202-326-0646

Fax Number: _____

E-mail Address: appleton@ncga.com; ricks@ncga.com

<u>First Name</u>	<u>Last Name</u>	<u>Job Title</u>	<u>Member Title</u>	<u>Member First Name</u>	<u>Member Last Name</u>
Ben	Ayres	Legislative Assistant	Sen.	David	Perdue
Sean	Babington	Senior Professional Staff Member			
Andrew	Bahrenburg	Legislative Assistant	Sen.	Patrick	Leahy
Savannah	Block	Legislative Correspondent	Sen.	John	Hoeven
Janae	Brady	Senior Professional Staff Member			
Rosalyn	Brummette	Policy Analyst			
Keagan	Buchanan	Counsel	Sen.	Amy	Klobuchar
Laura Lee	Burkett	Legislative Assistant	Sen.	Debra	Fischer
Stephanie	Carlson	Legislative Assistant	Sen.	Chuck	Grassley
Alyssa	Charney	Legislative Assistant	Sen.	Robert	Casey
Fred	Clark	Senior Counsel			
Meghan	Cline	Communications Director, Republican			
Lane	Coberly	Staff Assistant/Legislative Correspondent			
Eric	Deeble	Legislative Assistant	Sen.	Kirsten	Gillibrand
Haley	Donahue	Legislative Assistant			
Ryan	Donnelly	Legislative Assistant	Sen.	John	Thune
Taylor	Dunivin	Legislative Fellow	Sen.	Debbie	Stabenow
Matt	Erickson	Chief Economist			
Debu	Gandhi	Counsel	Sen.	Richard	Durbin
James	Glueck	Staff Director, Republican			
Ward	Griffin	U.S. Commodity Futures Trading Commission Detailee			
Payne	Griffin	Legislative Assistant	Sen.	Mike	Braun
Darin	Guries	Senior Professional Staff Member			
Hans	Hansen	Deputy Chief Clerk			
George	Hartmann	Press Secretary	Sen.	Chuck	Grassley
Chance	Hunley	Legislative Assistant			
Chelsie	Keys	Senior Professional Staff Member			
Kevin	Lefebber	Legislative Assistant	Sen.	Richard	Durbin
Jess	McCarron	Press Secretary, Democratic			
Bobby	Mehta	Information Technology Director			
DaNita	Murray	Chief Counsel			
Katie	Naessens	Professional Staff Member			
Lizzy	Peluso	Chief of Staff	Sen.	Amy	Klobuchar
Meris	Petek	Policy Adviser	Sen.	Joni	Ernst
Sanjana	Puskoor	Legislative Aide	Sen.	Michael	Bennet
Andy	Rezendes	General Counsel, Republican			
Christine	Rock	Staff Assistant/Legislative Correspondent			
Rob	Rosado	Senior Professional Staff Member			
Julia	Rossmann	Staff Assistant			
Katie	Salay	Archivist			
Adam	Schiff	Agriculture Legislative Assistant	Sen.	Tina	Smith
Mike	Schmidt	Senior Professional Staff Member			
Jacqlyn	Schneider	Deputy Staff Director/Policy Director			
Quentin	Scholtz	Legislative Aide	Sen.	Addison	McConnell

Mary Beth	Schultz	Chief Counsel, Democratic			
Katelyn	Schultz	Assistant Press Secretary	Sen.	Chuck	Grassley
Joe	Shultz	Staff Director, Democratic			
Skylar	Sowder	Legislative Assistant	Sen.	John	Boozman
Joe	Stallworth	Printing and Binding Director/U.S. Government Publishing Office Detailee			
Wayne	Stoskopf	Senior Professional Staff Member			
Dan	Swanson	Senior Counsel			
Adam	Tarr	Senior Professional Staff Member			
Katherine	Thomas	Legislative Assistant	Sen.	Charles	Roberts
Nicole	Tieman	Deputy Communications Director	Sen.	Chuck	Grassley
Niambe	Tomlinson	Legislative Correspondent	Sen.	Kirsten	Gillibrand
Daniel	Ulmer	Deputy Chief of Staff, Policy	Sen.	Cindy	Hyde-Smith
Kyle	Varner	Professional Staff Member			
Andrew	Vlasaty	Senior Professional Staff Member			
Brian	Werner	Senior Legislative Assistant	Sen.	Amy	Klobuchar
Jessie	Williams	Chief Clerk			
Pete	Wyckoff	Energy and Environment Policy Adviser	Sen.	Tina	Smith
Joe	Zogby	Chief Counsel			
Michael	Zona	Communications Director	Sen.	Chuck	Grassley

Itinerary

Soil Health Partnership Field Day: Harborview Farms

8:30-10:30am – Bus trip from DC to Harborview Farms

10:30-11:15am – Trey Hill, owner and operator at Harborview Farms

- Discuss the soil health management activities he uses on his farm.
- Discuss the beneficial nature of soil health management at the farm level. An overview of how it impacts yields, inputs, and the environment on a micro and macro level.
- Climate Change: Farmers are on the front lines of climate change as stewards of vast amounts of land as they feed the world. How is this viewed within the farmer community, and what are Corn Growers doing to work toward this goal?

11:15am-11:40pm – Ray Weil, Professor at University of Maryland in the Department of Environmental Science and Technology

- Discuss the benefits of Soil Health Practices on soil properties and a deep dive into what key soil properties consist of.
- In-field demonstration with a Soil Pit to show the benefits of diverse cover crop species, and how those species can impact row crop systems.

11:40-12:10pm – Lunch at the farm

12:10-12:25pm - Maria Bowman, Lead Scientist of the Soil Health Partnership (SHP)

- Overview of the SHP program. What have we done, the data we are collecting, and how SHP works hand in hand with farmers on the ground level to improve their soil health management.
- Discuss the impact of the research we are doing on farm economics and sustainability. The discussion will include how this research will affect the economic viability of farms.

12:25-1:05pm – Jim Isermann and Keith Byerly, Field Managers for SHP

- Discuss the pros and cons of cover crop management in the Eastern and Western corn belt. They will give their personal experiences interacting with growers and explain how different parts of the country have different soil health needs, and each practice yields different benefits. We will discuss cover crops management, and the risks involved in changing a grower's management toward more soil health.

1:05-1:30pm – Steven Mirsky, USDA Research Ecologist

- Research collaborator at Harborview Farms will provide an overview of their research project and what questions they hope to answer about soil health and different soil health management techniques.

1:30-2:30pm –Panel Q & A led by John Mesko, Senior Director of SHP

- Open discussion with the day's presenters. This will be an opportunity for attendees to address the many ways that soil health plays into the larger economy and climate change. Panel will include Trey Hill, SHP Field Team, Ray Weil, and Steven Mirsky.

2:30-4:30pm – Bus trip from farm to DC

Keys, Chelsie (Agriculture)

From: Kendra Ricks <Ricks@ncga.com>
Sent: Wednesday, October 16, 2019 5:10 PM
To: Kendra Ricks
Subject: Soil Health Partnership Field Event at Harborview Farms
Attachments: Private Sponsor Travel Certification Form Packet.pdf



Please join us **November 22, 2019**, from **10:30 AM - 2:30 PM** for a **Soil Health Partnership Field Event** at Harborview Farms in Rock Hall, Maryland.

The Field Day event will focus on how [Harborview Farms](#) has worked to create an advanced soil health management system, and the story of how the farmer has worked to successfully incorporate sustainability practices into his operation. Key themes of the event will include soil health, conservation and economics.

This event will also highlight [Soil Health Partnership](#) (SHP) staff experiences working hand in hand with farmers across the United States to manage soil health, improve environmental and economic outcomes and analyze the data from SHP's network of over 220 farms across 15 states. Improved environmental outcomes include reducing greenhouse gas emissions to offset climate change. Government and university scientists who are studying how soil health management can impact soil properties have also been invited to share their work with the group.

Please **RSVP by Monday, October 21** to ricks@ncga.com. NCGA will provide bus transportation to and from the farm and lunch on site. Detailed transportation information will be sent to attendees closer to the event.

Due to Senate Ethics rules, you will need to complete the form for Private Sponsored Travel by **next Tuesday, October 22** found here: https://www.ethics.senate.gov/public/index.cfm?a=Files.Serve&File_id=26749bec-6e49-4d48-80f3-03c9eee36624 (If the link does not work, please copy and paste it into your browser).

The Private Sponsored Travel Certification Form needed to accompany your form is attached to this email.

Thank you,

The Soil Health Partnership & the National Corn Growers Association

The information in this email, and any attachments, is intended by the National Corn Growers Association for the use of the named individual or entity to which it is addressed and may contain information that is privileged, proprietary, copyrighted, trademarked, etc. or otherwise confidential. It is not intended for transmission to, or receipt by, any individual or entity other than the named addressee (or a person authorized to deliver it to the

JOHNNY ISAKSON, GEORGIA, CHAIRMAN
CHRISTOPHER A. COONS, DELAWARE, VICE CHAIRMAN

PAT ROBERTS, KANSAS
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DEBORAH SUE MAYER, CHIEF COUNSEL AND STAFF DIRECTOR
CAMI MORRISON, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981
FACSIMILE: (202) 224-7416
TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

November 8, 2019

Chelsie Keys
Committee on Agriculture, Nutrition, and Forestry
United States Senate
Washington, DC 20510

Dear Ms. Keys:

This responds to your recent correspondence concerning an invitation you received to travel on a fact-finding trip to Harborview Farms in Rock Hall, Maryland, on November 22, 2019, sponsored by the National Corn Growers Association (NCGA). NCGA certified to the Select Committee on Ethics (the Committee) that it will pay the *necessary expenses*¹ related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. However, NCGA has certified that it is a private entity that retains or employs a registered lobbyist and that no registered lobbyist or agent of a foreign principal will accompany you on *any segment of your trip*.²

Based on information and materials available to the Committee, and assuming the **actual** travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this one-day trip **may be accepted** under relevant Senate Rules and the Committee's *Regulations and Guidelines for Privately-Sponsored Travel*, so long as at the time of the payment or reimbursement, NCGA is neither a registered lobbyist or lobbying firm under the Lobbying Disclosure Act of 1995, or an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35.

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel**.

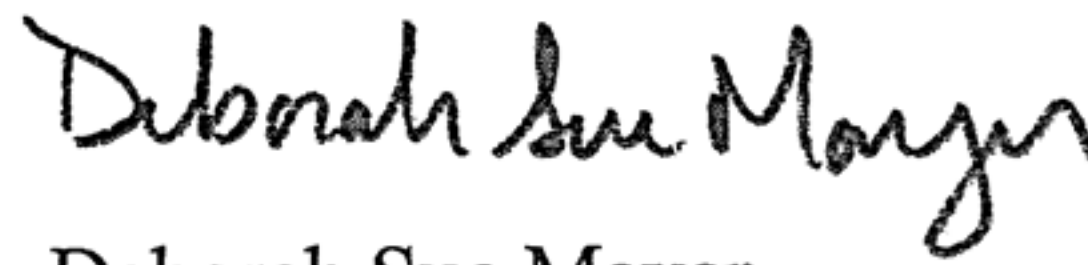
¹ The term "necessary expenses" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

² The term "any segment of your trip" has a specific definition. See *id.* at 3.

Finally, Senate Rule 34 requires a reporting individual,³ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Deborah Sue Mayer
Chief Counsel and Staff Director

Enclosure: Travel Checklist

³ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$127,914 for CY 2019) or is a political fund designee and is required to file Financial Disclosure Reports.